

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Judge Brian D. Lynch
Hearing Date: October 26, 2022
Hearing Time: 9:00 a.m.
Location: Tacoma, Washington
Response Deadline: October 19, 2022

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re
STEPHEN ROBERT BROWN,
Debtor.

Case No. 22-40097-BDL

DECLARATION MATTHEW J.P.JOHNSON
IN SUPPORT OF UNITED STATES
TRUSTEE'S LIMITED OBJECTION TO
DEBTOR'S MOTION FOR ORDER
AUTHORIZING EMPLOYMENT OF
ATTORNEY

I, Matthew J.P. Johnson, declare under penalty of perjury:

1. I am an attorney with the Office of the United States Trustee. I represent the
United States Trustee ("U.S. Trustee") in the above-captioned case.

2. I am over the age of 18 and am competent to testify regarding the facts set forth in
this motion, which are based on my personal knowledge and on records kept in the ordinary
course of the U.S. Trustee's business.

3. Attached hereto as Exhibit A, is a true and correct copy of Plaintiff's Motion for
Judgment on Special Jury Verdict, which I downloaded from the Superior Court for Pierce
County Docket in case number 20-2-06886-7. Attached to Plaintiff's Motion, starting at page 4,
is a copy of the special verdict form, which includes the jury's findings and calculation of
damages. Based on my review of the docket in the case number 20-2-06886-7, no hearing was
held on the Plaintiff's Motion.

DECLARATION OF MATTHEW J.P.
JOHNSON IN SUPPORT OF UNITED STATES
TRUSTEE'S MOTION TO DISMISS CASE -
Page 1

Office of the United States Trustee
United States Courthouse
700 Stewart Street, Suite 5103
Seattle, WA 98101-1271
206-553-2000, 206-553-2566 (fax)

4. Attached hereto as Exhibit B is a true and correct copy of the Deed of Trust that lists the Iwama Law Firm as the Trustee, Stephen R. Brown as Grantor, and Robert G. Brown, Trustee of Brown Family Decedents Trust dated February 23, 2017, as the Beneficiary. I received a copy of this document from the Proposed Attorneys and viewed the recorded copy online through the Pierce County records system.

5. Attached hereto as Exhibit C, is a true and correct copy of the promissory note that was provided to me by the Proposed Attorneys.

6. Attached hereto as Exhibit D is a true and correct copy of the escrow transactions related to the funds transferred by Robert Brown prior to the filing of the petition, which was provided to me by the Proposed Attorneys.

7. Attached hereto as Exhibit E are true and correct excerpts from the Brown Family Trust Dated January 14, 1994, provided to me by the Proposed Attorneys. I will file a complete copy of the document I received upon request of any party.

Dated Wednesday, October 19, 2022, by

/s/ Matthew J.P. Johnson
Matthew J.P. Johnson, WSBA # 40476
Attorney for United States Trustee

DECLARATION OF MATTHEW J.P.
JOHNSON IN SUPPORT OF UNITED STATES
TRUSTEE'S MOTION TO DISMISS CASE -
Page 2

Office of the United States Trustee
United States Courthouse
700 Stewart Street, Suite 5103
Seattle, WA 98101-1271
206-553-2000, 206-553-2566 (fax)